



Esra A. Hudson
Manatt, Phelps & Phillips, LLP
Direct Dial: 310-312-4381
ehudson@manatt.com

June 13, 2025

VIA ECF

The Honorable Lewis J. Liman
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl St., Room 1620
New York, NY 10007

Re: Lively v. Wayfarer Studios LLC, et al., No. 1:24-cv-10049-LJL [rel. No. 1:25-cv-00449]

Dear Judge Liman:

Pursuant to Rule 4.b of Attachment A to your Honor's Individual Rules, we write on behalf of Blake Lively regarding our letter motion to seal Exhibits B through M to Ms. Lively's Motion to Compel. Dkt. No. 293. On June 6, 2025, Ms. Lively moved to seal Exhibits B through M because the Wayfarer Parties designated the documents as confidential.

Ms. Lively has conferred with the Wayfarer Parties, who confirmed that they do not seek to maintain Exhibits B through M under seal. Accordingly, Ms. Lively respectfully requests that the Court unseal Exhibits B through M to Ms. Lively's Motion to Compel. *See* Dkt. Nos. 294-1 – 294-12.

Respectfully submitted,

/s/ Esra A. Hudson

WILLKIE FARR & GALLAGHER LLP
Michael J. Gottlieb
Kristin E. Bender
Meryl Governski (admitted *pro hac vice*)
1875 K Street NW
Washington, DC 20006
(202) 303-1000
mgottlieb@willkie.com
kbender@willkie.com
mgovernski@willkie.com

Aaron E. Nathan
787 7th Avenue
New York, NY 10019
(212) 728-8000
anathan@willkie.com

MANATT, PHELPS & PHILLIPS, LLP
Esra A. Hudson (admitted *pro hac vice*)
Stephanie A. Roeser (admitted *pro hac vice*)
2049 Century Park East, Suite 1700
Los Angeles, CA 90067
(310) 312-4000
ehudson@manatt.com
sroeser@manatt.com

Matthew F. Bruno
7 Times Sq.
New York, NY 10036
(212) 790-4500
mbruno@manatt.com

Attorneys for Blake Lively